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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND DIVISION

19 UNITED STATES OF AMERICA, ) NO. CR 19-00489 JST  
20 Plaintiff, )  
21 v. )  
22 OLEG TINKOV )  
A/K/A/ OLEG TINKOFF, )  
23 Defendant. )  
24 )  
25 )  
26 )  
27 )  
28 )  
Defendant Oleg Tinkov, by and through his retained counsel, the United States Attorney's Office  
for the Northern District of California, by and through Assistant United States Attorney Michelle J.

Kane, and the United States Department of Justice, Tax Division, by and through Trial Attorney Peter Anthony, hereby stipulate and agree to the following:

1. In Defendant Oleg Tinkov's Unopposed Administrative Motion to File Under Seal Exhibits to Defendant's Motion to Expedite Sentencing, filed on September 17, 2021 ("Administrative Motion to File Under Seal"), Mr. Tinkov moved the Court to seal Exhibits C – N appended to the Declaration of Jeremy H. Temkin in Support of Defendant's Motion to Expedite Sentencing (the "Temkin Declaration"). Exhibits C – L are expert medical reports, and Exhibit N is a letter from Mr. Tinkov's treating physician. Mr. Tinkov asked that these medical records be placed under seal because they contain private, confidential, and sensitive information. *United States v. Lopez-Perez*, No. 14-CR-45, 2021 WL 809396, at \*1 (E.D. Cal. Mar. 3, 2021); *see also United States v. Keys*, No. 16-CR-234, 2020 WL 6700412, at \*7 (E.D. Cal. Mar. 15, 2021).

2. Exhibit M is an executed Plea Agreement between Mr. Tinkov and the United States that had at that time not yet been accepted by this Court. In his Administrative Motion to File Under Seal, Mr. Tinkov asked the Court to seal Exhibit M to the Temkin Declaration pending acceptance of the Plea Agreement by this Court. Mr. Tinkov acknowledged that there was a presumption that the Plea Agreement would be placed on the public docket when it was lodged with the Court. The Plea Agreement has indeed since been filed on the public docket on October 1, 2021 (ECF. No. 25).

3. In his Administrative Motion to File Under Seal, Mr. Tinkov did not request that the Court seal his Motion to Expedite Sentencing and the Temkin Declaration. Rather, those documents were filed under seal in the first instance so that Exhibits C –N to the Temkin Declaration could be filed under seal. The Government did not oppose Mr. Tinkov's Administrative Motion to File Under Seal.

4. The Court granted Mr. Tinkov's Administrative Motion to File Under Seal. At present, the Motion to Expedite Sentencing, the Temkin Declaration, and Exhibits C – L and N to the Temkin Declaration remain sealed.

5. The parties now jointly request that only the Motion to Expedite Sentencing, the Temkin Declaration and Exhibits A, B and M to the Temkin Declaration be unsealed. The parties jointly request that Exhibits C – L and N to the Temkin Declaration remain under seal.

1 IT IS SO STIPULATED.  
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5 STEPHANIE M. HINDS  
6 Acting United States Attorney  
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9 Dated: 10/19/2021  
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12 /s/  
13 MICHELLE J. KANE  
14 Assistant United States Attorney  
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17 Dated: 10/19/2021  
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20 /s/  
21 PETER ANTHONY  
22 Trial Attorney  
23 U.S. Department of Justice, Tax Division  
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25

26 Dated: 10/19/2021  
27  
28

29 /s/  
30 JEREMY H. TEMKIN, Esq.  
31 Pro Hac Vice  
32 Attorney for Defendant  
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35 Dated: 10/19/2021  
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38 /s/  
39 CHRISTOPHER MORVILLO, Esq.  
40 Pro Hac Vice  
41 Attorney for Defendant  
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44 Dated: 10/19/2021  
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47 /s/  
48 ISMAIL RAMSEY, Esq.  
49 Attorney for Defendant  
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1                   **[PROPOSED] ORDER**

2       The Court, having considered the Stipulation Regarding Unsealing Defendant Oleg Tinkov's  
3 Motion to Expedite Sentencing and the Temkin Declaration, and good cause appearing, hereby  
4 ORDERS that the Motion to Expedite Sentencing, the Temkin Declaration and Exhibit A, B and M to  
5 the Temkin Declaration be unsealed. The Court further ORDERS that Exhibits C – L and N of the  
6 Temkin Declaration will remain under seal.

7       IT IS SO ORDERED.

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9       DATED: October 21, 2021

  
HON. JON S. TIGAR  
United States District Judge